

MEMO ENDORSED

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THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

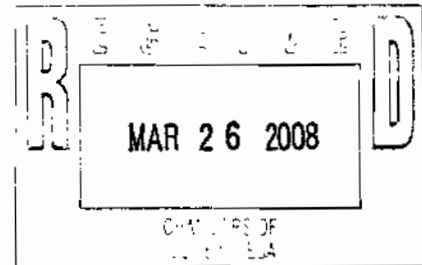
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March 24, 2008

BY HAND

Honorable Thomas P. Griesa
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: Haji v. United States of America, et al., 08 CV ²²³⁰~~2330~~ (TPG)

Dear Judge Griesa:

I am an attorney in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, counsel for defendant City of New York in the above-referenced action alleging violations of plaintiff's civil rights. Defendant respectfully requests that its time to respond to the complaint be extended by sixty days from the current due date of March 26, 2008, to May 27, 2008. Plaintiff's counsel has consented to this request for an enlargement of time.

We request this enlargement of time because, in keeping with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need this additional time to investigate the allegations of the complaint. It appears from the complaint that plaintiff is alleging violations of his Constitutional rights arising principally from activities of federal and state law enforcement officers that led to his arrest pursuant to a federal arrest warrant on or about July 26, 2006. He alleges that an indictment against him was dismissed on January 8, 2007. Accordingly, the underlying records may be sealed. This office is beginning the process of investigating the underlying matter so that we can properly assess the case and respond to the amended complaint.¹

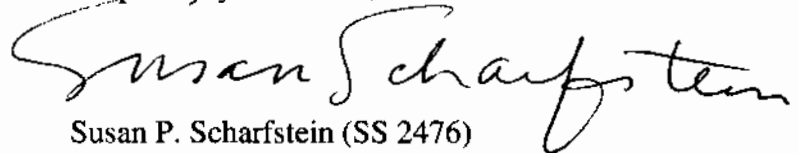
¹ This enlargement also will give plaintiff time in which to serve the remaining defendants, if he has not already done so, before issue is joined as to any of the defendants.

Approved 3/28/08
Thomas P. Griesa / USJD

No previous request for an extension of time to respond to the complaint has been made by defendant City of New York. Accordingly, we respectfully request that defendant City of New York's time to answer or otherwise respond to the amended complaint be extended to May 27, 2008.

Thank you for your consideration herein.

Respectfully submitted,

A handwritten signature in black ink, reading "Susan Scharfstein". The signature is fluid and cursive, with the first name "Susan" and last name "Scharfstein" clearly legible.

Susan P. Scharfstein (SS 2476)

cc: Eugene B. Nathanson, Esq.
Attorney at Law
30 Vesey Street, 4th Floor
New York, NY 10007
(by hand)